



August 28, 2009

**VIA ECF**

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

**Ross A. Buntrock**

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**RE: WC Docket No. 09-152: Petition for Declaratory Ruling and Contingent For Preemption of Great Lakes Communication Corp. and Superior Telephone Cooperative**

Dear Ms. Dortch:

On August 27, 2009, Joshua Nelson of Great Lakes Communication Corp. ("Great Lakes") and I met with Priya Aiyar, Legal Advisor to Chairman Genachowski's office and Christi Shewman, Acting Legal Advisor to Commissioner's Baker's office to discuss Great Lakes' Petition for Declaratory Ruling to the Iowa Utilities Board and Contingent Petition for Preemption ("Petition"). On August 28, 2009, Mr. Nelson and I met with Jennifer Schneider, Legal Advisor to Commissioner Copps's office, Ajit Pai, Chris Killion and Diane Griffin Holland of the Office of General Counsel, and John Hunter and Al Lewis of the Wireline Competition Bureau to discuss the same.

Consistent with the Petition filed with the Commission on August 14, 2009, Great Lakes emphasized that the August 14, 2009 decision of the Iowa Utilities Board ("IUB") in a complaint proceeding initiated by Qwest Communications Corporation against Great Lakes and Superior, along with several Iowa LECs (FCU 07-2) drastically oversteps the IUB's jurisdictional limitations. The IUB granted the relief sought by Qwest at its decision meeting on August 14, 2009. We reiterated that complying with the IUB's order will interfere with the ability of Great Lakes to provide interstate telecommunications services. The IUB's rulings are flatly inconsistent with federal precedent and federal policy governing interstate access charges, and therefore Great Lakes will be unable to comply with both federal law and the dictates of the IUB order. As a result, we underscored the need for the Commission to clarify to the IUB the limits of its jurisdiction, and to preempt the IUB's improper order, which violates federal policy and impinges upon Great Lakes's ability to offer interstate telecommunications services.

I request that this letter, which is being filed electronically, be placed in the file for the above-captioned proceeding.

Arent Fox

Please contact me at (202) 775-5734 with any questions.

Sincerely,



Ross A. Buntrock

cc: Priya Aiyar, Legal Advisor to Chairman Julius Genachowski  
Christi Shewman, Acting Legal Advisor to Commissioner Baker  
Jennifer Schneider, Legal Advisor to Commissioner Copps  
Ajit Pai  
Chris Killion  
Diane Griffin Holland  
John Hunter  
Al Lewis